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STATE OF ILLINOIS  
Pollution Control Board

September 5, 2013



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Transportation Division

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Members of the Illinois Pollution Control Board  
c/o John Therriault, Assistant Clerk  
Illinois Pollution Control Board  
100 W. Randolph Street, Suite 11-500  
Chicago, IL. 60601-3218

Re: Docket No. 2014-010 (Air Variance)

Dear Members of the Illinois Pollution Control Board:

On behalf of the nearly 10,000 active and retired SMART-Transportation Division members in Illinois, I would like to submit our support of the application for a variance by Illinois Power Holdings, LLC (IPH). The variance being requested by IPH, a Dynegy subsidiary, involves the same facilities, the same regulations, and the same requested relief that was granted to the former owner of the coal-fired power plants, Ameren Energy Resources, in a September 20, 2012 decision by the Board ("AER v. IEPA" or "PCB 12-126").

In that decision, the Board recognized that compliance with scheduled emission standards would have posed an arbitrary and unreasonable hardship, evidenced by the receipt of more than 3,000 public comments during a Board proceeding leading up to their decision. It also resulted in a compliance agreement that provided a net benefit for Illinois air quality, while at the same time providing economic benefits by keeping the power plants open and operating.

The variance request by IPH will not cause an increase in air emissions, yet allowing electrical generating units additional time to retrofit controls will help increase job growth in the construction industry, especially in some of the economically-depressed rural areas suffering from high unemployment, and surely help avoid a reduction in railroad workforce that would occur should these facilities be shuttered.

Closures of such facilities would also allow for the downgrading or abandonment of rail lines in these areas, further hampering the communities and small businesses that rely on the rail service.

We would urge the Board to support railroad workers and job creation, the environment and economic development by approving IPH's petition for relief. Thank you for your time and consideration on this matter.

Sincerely,

Robert W. Guy  
State Director

cc: The Honorable Pat Quinn, Governor of Illinois  
Mr. Wesley J. Lujan, Union Pacific Railroad  
Mr. Paul Piekarski, Brotherhood of Locomotive Engineers & Trainmen

PC# 110

